

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

[illegible]

STIPULATION

COME NOW, this day of , 2018, Debtors Michelle R. Bowers and Codebtor, Shawn P. Bowers, by and through their attorney, Joseph J. Nash, Esquire, and Portfolio Recovery Associates, LLC. Assignee of Ally Bank (“PRA”), by and through its servicing agent, PRA Receivables Management, LLC, by and through its attorneys, Mester & Schwartz, P.C., hereby stipulate the following terms of settlement of the Motion for Relief from Automatic Stay and Motion for Relief from Codebtor Stay:

WHEREAS the Debtor and Codebtor own a 2016 Dodge Ram 2500, V.I.N 3C6URCL0GG173671 (“vehicle”); and

WHEREAS the Debtor's confirmed plan does not provide for the treatment of the claim related to the vehicle through the plan; and

WHEREAS the vehicle is in the possession of the Codebtor; and

WHEREAS PRA filed a Motion for Relief from Automatic Stay and Motion for Relief from Codebtor Stay (“Motions”); and

WHEREAS the parties wish to address issues related to the payment of the claim outside of the bankruptcy; and

WHEREAS the Debtors and PRA seek to resolve the Motions; it is hereby stipulated and agreed that:

1. The automatic stay and codebtor stall be lifted with respect to the Movant related to the 2016 Dodge Ram 2500, V.I.N 3C6URCL0GG173671.
2. It is further Ordered that this grant of relief from stay shall remain in full force and effect, notwithstanding any subsequent conversion of this case to another chapter.
3. The stay of the Order as provided under Rule 4001 (a)(3), F.R.B.P., is hereby waived.

BY THE COURT:

Carlota M. Bohm
U.S. BANKRUPTCY JUDGE

Respectfully submitted,

MESTER & SCHWARTZ, P.C.

Dated: 10/22/18

/s/ Laurence A. Mester
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Dated: 10/22/18

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Dated: 10/22/18

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